REMARKS

Claims 1-24 and 27-33 are currently pending in the subject application and are presently under consideration. Claims 1, 2, 4, 5, 7, 9-11, 13-15, 18-22, 24, 27, 28, 30, 32, and 33 have been amended as shown on pages 3-8 of the Reply. In addition, the specification has been amended as indicated on pages 2.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 1-24, 27-29, and 33 Under 35 U.S.C. §102(e)

Claims 1-24, 27-29, and 33 are rejected under 35 U.S.C. §102(e) as being anticipated by Lewallen (US Pat No. 7,020,882 B1). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Lewallen does not disclose each and every feature set forth in the subject claims.

> For a prior art reference to anticipate, 35 U.S.C. §102 requires that "each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (*quoting Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

The subject application relates to remote visualization of an industrial device using scalable vector graphics (SVG). An XML-based SVG file associated with an industrial device can be created and saved in a data store associated with the device. The SVG file can be accessed by a remote user *via* a Web-based client interface, and can then be executed locally on the client using ASCII drawing commands invoked by the file to facilitate rendering an interactive vector image representation of the industrial device. The file can be executed by and the image rendered on a Web browser or an open software package such as Adobe or Macromedia. In particular, amended independent claim 1 recites, *an interface component that* ***retrieves a stream of SVG information from storage associated with a device****, the SVG information including data representative of the device's physical faceplate; and a display component that* ***executes the stream of SVG information within a Web browser via ASCII***

drawing commands to render an interactive graphical representation of the device's faceplate *within a remote viewing window of the Web browser.*

Contrary to assertions made in the Office Action, Lewallen does not disclose these aspects. Lewallen relates to a technique for remote manipulation of a user interface across a network. According to this technique, a server transmits an object, such as Document Object Model (DOM), to a remote computer. The server additionally transmits a W3C API to the remote computer. A bridge at the remote computer converts the W3C into a user interface API that can be used to manipulate the object on the remote computer from the server. The Office Action ostensibly equates the W3C API received at the remote computer with the SVG information of independent claim 1, indicating in particular that the W3C API is converted to a user interface API at the remote computer, and that this user interface can comprise a Scalable Vector Graphic format of the DOM.

However, Lewallen's remote manipulation system is structurally and functionally distinct from the remote visualization system set forth in claim 1. For one, the cited W3C API is not described as being *executed via ASCII drawing commands to render an interactive graphical representation of a device's faceplate*. Rather, the W3C API of Lewallen is converted into a user interface API at the remote computer *using API mappings and object mappings* maintained within the aforementioned bridge (see, for example, column 5, lines 31-37 of Lewallen). The cited reference makes no mention of rendering an interactive graphical representation of a device's faceplate within a browser using *ASCII drawing commands* to execute a received stream of SVG information. Rendering an interactive representation of a device by executing received SVG information using ASCII drawing commands can mitigate the need to maintain complicated mappings at the client such as those employed in Lewallen's system. Moreover, the user interface AVI that results from conversion of Lewallen's W3C API does not *render an interactive graphical representation of a device's faceplate*, but rather acts as an interface to a DOM running on the remote computer.

Amended independent claim 1 goes on to recite, *the interactive graphical representation* ***allowing a user to remotely monitor and modify at least one parameter associated with the device via the Web browser.*** As already noted, Lewallen does not disclose or suggest that SVG information can be received from storage associated with a device and executed using ASCII drawing commands to render an interactive graphical representation of the device's faceplate.

More specifically, the cited reference does not disclose that a graphical representation rendered in this manner can allow a user to remotely monitor and modify a parameter associated with the device being represented. In this regard, the Office Action notes that, according to Lewallen, a server can transmit a W3C API to a remote computer, and that the user interface API generated on the remote computer from this W3C API can allow the server to remotely manipulate a DOM on the remote computer. The Office Action presumably equates this W3C API with the SVG information of independent claim 1. However, in the cited scenario, it is the computer *receiving* the W3C API that is being controlled by the server, which initially transmitted the W3C API to the remote computer for this purpose.

By contrast, amended independent claim 1 provides for an interface component that retrieves a stream of SVG information *from storage associated with a device*, and a display component that executes the stream of SVG information to render an interactive graphical representation of the device's faceplate that allows a user to *remotely monitor and modify at least one parameter associated with the device* (that is, the device from which the SVG information was received). The cited reference does not disclose such a system for remotely rendering an interface for monitoring and modifying a parameter associated with a device.

Similarly, amended independent claim 13 recites, *a data conveying component that is utilized to* ***stream device-related data in Scalable Vector Graphics (SVG) format****; an interface component that couples the data conveying component to a device residing on a network; and a network browser that* ***retrieves a stream of the device-related data from the device and executes the data using ASCII drawing commands to generate an interactive graphical depiction of the device****, the interactive graphical depiction allowing a user to monitor and modify at least one operational parameter within the device.* As discussed *supra*, Lewallen does not disclose or suggest these features.

Also, amended independent claim 24 recites, *creating a Scalable Vector Graphics (SVG) file that represents at least one aspect of the device;* ***storing the SVG file with the device;*** ***employing a remote Web browser to access the SVG file****; and* ***employing ASCII drawing commands to execute instructions embedded within the SVG file at the Web browser to generate an interactive graphical representation of the at least one aspect of the device*** *within the remote web browser, the interactive graphical representation facilitating remote monitoring*

and modification of at least one operational parameter of the device. Lewallen is silent regarding these aspects, as already noted.

In addition to the features already discussed, one or more embodiments of the present invention teach that the device storage persisting the SVG information can periodically search for newly created or updated versions of the SVG information. Upon detection of new or updated SVG information, the data storage can retrieve the updated SVG information for storage. In this way, a client wishing to monitor a remote device can be provided with up-to-date SVG information in order to render a current graphical interface for the device. In particular, amended claim 4 recites, *the storage associated with the device periodically checks for updated SVG information and automatically retrieves the updated SVG information for storage upon detection.* Lewallen makes no allowances for such an automated updating technique, particularly in the context of the SVG-based remote monitoring system set forth in the subject claims.

Likewise, amended claim 15 recites, *the device-related data is stored in a data bank associated with the device, the data bank periodically checking for updated device-related data and automatically retrieving the updated device-related data for storage upon detection.* Lewallen does not disclose or suggest these features, as already noted.

In view of at least the foregoing, it is respectfully submitted that Lewallen does not disclose each and every feature of amended independent claims 1, 13, and 24 (and all claims depending there from), and as such fails to anticipate or render obvious the present invention. It is therefore requested that this rejection be withdrawn.

II. Rejection of Claims 28 and 30-32 Under 35 U.S.C. §102(e)

Claims 28 and 30-32 are rejected under 35 U.S.C. §102(e) as being anticipated by Chapman *et al.* (US 2004/0021679 A1). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Chapman *et al.* does not disclose each and every feature of the subject claims.

Amended independent claim 28 recites, *establishing a connection with a network associated with a device**; retrieving a stream of SVG information from a computer-readable storage medium associated with the device; and executing the stream of SVG information within the remote interface using ASCII drawing commands to draw a dynamically updated interactive graphic of the device,** the interactive graphic displaying a real-time status of at least*

one parameter associated with the device and allowing a user to remotely modify the at least one parameter. As discussed in the previous section of the Reply, Lewallen does not disclose or suggest such a method for rendering an interactive graphic of a device. Chapman *et al*. is also silent regarding these features. Chapman, *et al*. relates to an HMI architecture that facilitates creation of HTML display pages used to remotely visualize an industrial process *via* a Web-based interface. However, although Chapman discloses that this Web-based interface can include support for SVG web file formats, as indicated in the Office Action, the cited reference nowhere discloses or suggests receiving a stream of SVG information from a storage medium associated with a device, and executing this retrieved information at a remote interface using ASCII drawing commands to render an interactive graphic of the device.

Similarly, amended claim 30 recites, *means for* ***retrieving a Scalable Vector Graphics (SVG) file with device-related information from a computer-readable storage medium associated with the device****; means for invoking the SVG file within a Web-based browser; means for executing* ***the SVG file within the Web-based browser using ASCII drawing commands to generate an interactive graphical representation of a faceplate for the device****; and means for viewing and modifying at least one operational parameter within the device via the interactive graphical representation*. Chapman *et al* does not disclose or suggest generating an interactive representation of a device's faceplate in this manner, as discussed above.

In view of at least the foregoing, it is respectfully submitted that Chapman *et al*., alone or in combination with Lewallen, does not disclose all aspects of amended independent claims 28 and 30 (and claims 31 and 32, which depend from claim 30), and as such fails to anticipate or render obvious the subject invention. It is therefore requested that this rejection be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [ALBRP331USA].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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